

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

RICHARD ALEXANDER  
MURDAUGH, JR.,

Plaintiff,

v.

BLACKFIN, INC., WARNER BROS.  
DISCOVERY, INC., WARNER  
MEDIA ENTERTAINMENT PAGES,  
INC., CAMPFIRE STUDIOS INC.,  
THE CINEMART LLC, NETFLIX,  
INC., GANNETT CO., INC. and  
MICHAEL M. DEWITT, JR.,

Defendants.

Civil Action No.: 9:24-cv-04914-RMG

**MOTION TO DISMISS OF**  
**BLACKFIN, INC.**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Blackfin, Inc. (“Blackfin”) respectfully moves this court for an Order dismissing Plaintiff’s Complaint. The basis for this Motion is that the Complaint fails to state a claim upon which relief can be granted.

This Motion is supported by applicable law, Blackfin’s Memorandum of Law filed simultaneously herewith, and any additional supporting memoranda that may be submitted by Blackfin at or before any ruling on this Motion.

WHEREFORE, Defendant Blackfin, Inc. respectfully requests that the Court enter an Order Dismissing Plaintiff’s Complaint.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

s/ MERRITT G. ABNEY

David E. Dukes, Esq. (Federal Bar No. 00635)

E-Mail: david.dukes@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

Merritt G. Abney, Esq. (Federal Bar No. 09413)

E-Mail: merritt.abney@nelsonmullins.com

151 Meeting Street / Sixth Floor

Post Office Box 1806 (29402-1806)

Charleston, SC 29401-2239

(843) 853-5200

WILLKIE FARR & GALLAGHER LLP

Meryl C. Governski, *admitted pro hac vice*

Kristin Bender, *admitted pro hac vice*

Willkie Farr & Gallagher LLP

1875 K Street NW

Washington, DC 20006

(202) 303-1000

mgovernski@willkie.com

kbender@willkie.com

*Attorneys for Defendants Blackfin, Inc., Warner Bros.  
Discovery, Inc., Warner Media Entertainment Pages, Inc. and  
Campfire Studios Inc.*

Charleston, South Carolina  
October 16, 2024